

Remarks/Arguments

Claims 1-14 are pending. The claims have been amended to overcome the rejection under 35 USC 112, second paragraph, and to correct obvious defects. No new matter is believed to be added by the present amendment.

Responsive to the objection to the abstract, applicants submit herewith a replacement abstract. Responsive to the guidelines illustrating the preferred layout of the specification, applicants have amended the specification to add appropriate section headings.

Objection to claims 1-13 under 35 USC 112, second paragraph

Applicants submit that the objections to claims 1-13 under 35 USC 112, second paragraph is overcome in view of the present amendment. Regarding the term "said given portal" antecedent basis is provided by recitation of "a given portal" in step (a). Claim 1 has also been amended to recite "said received routing table data received at step (a)" in step (b) and "said routing table data received at step (c)" in step (d) to clarify the received routing table data. The rejection to claims 5, 7 and 10-12 are also overcome in view of the amendment of claim 1.

Rejection of claims 1-4, 7-10 and 12-14 under 35 USC 102(b) as being anticipated by Tai, T., Gerla, M., "LAN interconnection; a transparent, short-path approach" IEEE International Conference on Communications, 23-26, June 1991, pages 1666-1670, vol. 3 (hereinafter "Tai")

Applicants submit that for the reasons discussed below present claims 1-4, 7-10 and 12-14 are not anticipated under 35 USC 102(b) by Tai.

Tai discloses a method of building routing tables at the level of brouters interconnecting networks. The method involves three steps. The first step, described on paragraph 2.2 of page 1667, column 2, is to determine a "delay table" which stores the delay and the outgoing port on the shortest path to LAN i. The second step is a phase of exchanging delay tables. The third step is to compute the routing table as a function of the delay tables as explained on page 1668, column 1. This process is periodically conducted to account for the changes in the network topology.

Applicants submit that Tai fails to disclose or suggest all of the limitations recited in claim 1, and as such, amended claim 1 is not anticipated by Tai.

The examiner cites page 1669, col. 1, third paragraph, as disclosing the features recited in steps (a) and (b). That is "... (a) transmitting, routing table data stored to its companion portal and receiving routing table data from its companion portal; (b) concatenating said received routing table data at step (a) with the contents of the portal's own routing table..."

Actually, the cited paragraph concerns the problem of building a mapping table between station id and LAN id, not routing table data. This paragraph is not at all concerned with building of a routing table. This problem does not arise in the invention where the network addresses are the concatenation of the bus id and the GUID of the destination on the bus.

The examiner cites page 1668, col. 2, and page 1668, col. 1, as disclosing the feature recited in step (c). That is, "... (c) broadcasting said its own routing table data on the portal's local bus..."

Actually, page 1668, col. 2 discusses an algorithm to determine a LAN id, not a method to build a routing table, and page 1668, col. 1 concerns the delay table used before the step of computing the routing table. Applicants submit that the teaching in the cited portions is not related to routing table data.

The examiner cites page 1668, col. 1 as disclosing step (d). First of all, the shortest path is not added to routing database, the delay table is used to compute the routing database. Tai does not appear to describe any operation that could be seen as a **concatenation** of routing table data. The use of term concatenation makes clear that the received routing table data are just added to the table.

Finally, the examiner cites page 1668, col. 2, paragraph 3.1, as disclosing the features recited in step (e). Step (e) recites "... repeating the above steps until routing data concerning all buses in the network has been received by said given portal." The cited paragraph 3.1 does not concern the building of routing table, and furthermore, it does not describe any iterative process. It describes the computation of LAN id, which is done in one step, and indicates that this step is conducted periodically to account for changes in the network.

In view of the above, applicants submit that Tai discloses a completely different method to compute routing table than the claimed invention. Tai

discloses a three step method, consisting of computing delay tables, exchanging these delay tables and computing routing tables from delay tables. By contrast, the claimed invention is an iterative process, consisting of exchanging routing table information between the two portals of a bridge, concatenate the routing table data, exchanging routing information between portals of the same bus and repeating the steps until all routing information have been received from all the busses. Tai addresses this problem in a different context and provides a totally different solution. Therefore, Applicants submit that Tai fails to disclose or suggest all of the limitations recited in amended claim 1, and as such, amended claim 1, and claims 2-4, 7-10 and 12-13, which depend therefrom, are not anticipated by Tai. Claim 14 recites the features of claim 1 in apparatus form, and as such, applicants submit that claim 14 is not anticipated by Tai for at least the same reasons as those discussed above.

Rejection of claims 5 and 6 under 35 USC 103(a) as being unpatentable over Tai and further in view of Garcia (US Published Application 20020049561)

Applicants submit that for the reasons discussed below present claims 5 and 6 are patentably distinguishable over the teachings of Tai and Garcia.

Garcia is cited as teaching that the routing table data transmitted or broadcast by a given portal contains the entire routing table, and that the teachings of Garcia would allow reevaluating the shortest path selection when changes occur to the network.

Applicants note that Garcia address the routing problem in an adhoc network that is completely different type of network. Also, applicants submit that Garcia fails to cure the defect of Tai as applied to claim 1, and as such, claims 5 and 6, which depend from claim 1, are patentably distinguishable over the combination of Tai and Garcia.

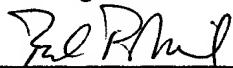
Rejection of claim 11 under 35 USC 103(a) as being unpatentable over Tai and further in view of Oechsle (US Pat. No. 5570466)

Applicants submit that for the reasons discussed below present claim 11 is patentably distinguishable over the teachings of Tai and Oechsle.

Oechsle is cited as teaching selecting the path to a given remote bus as a function of the bandwidth of portals on the path. Applicants submit that Oechsle fails to cure the defect of Tai as applied to claim 1, and as such, claim 11 is patentably distinguishable over the combination of Tai and Oechsle.

Having fully addressed the Examiner's rejections it is believed that, in view of the preceding amendments and remarks, this application stands in condition for allowance. Accordingly then, reconsideration and allowance are respectfully solicited. If, however, the Examiner is of the opinion that such action cannot be taken, the Examiner is invited to contact the applicant's attorney at (609) 734-6815, so that a mutually convenient date and time for a telephonic interview may be scheduled.

Respectfully submitted,
Y. Legallais, et al.



By: Paul P. Kiel
Attorney for Applicants
Registration No. 40,677

THOMSON Licensing Inc.
Two Independence Way, Suite 200
Princeton, NJ 08540

Date: April 25, 2005

CERTIFICATE OF MAILING

I hereby certify that this amendment is being deposited with the United States Postal Service as First Class Mail, postage prepaid, in an envelope addressed to Mail Stop Amendment, Commissioner for Patents, Alexandria, Virginia, 22313-1450 on:

4-25-05

Date

Karen Schlauch

Administrator Name